

## REMARKS

Reconsideration of this application, as amended, is respectfully requested.

Claims 1, 13 and 14 have been amended to more particularly define the invention over the prior art. In doing so, the subject matter of Claim 2 has been incorporated into Claims 1, 13 and 14, including the limitation that each converter device has a multiplicity of passages, with the additional limitation that the passages on at least two adjacent converter devices are not in alignment. Support for the additional limitation is found in the originally filed drawings, and particularly Figure 1.

New Claims 19 -21 have also been added, dependent on the independent Claims 1, 13 and 14, to include the limitation that each of the first and second conductive layer has a converter layer disposed thereon, to define outermost parts of each converter device. Support is found in the original application, *inter alia*, in Figure 1.

No new matter has been added in the claims through these amendments.

Applicants respectfully submit that the amended claims include subject matter that was not considered by the Examiner or the Board in the prior Decision on appeal, and are patentable over the prior art of record. In this regard, applicant avers that the prior art does not describe or suggest adjacent converter devices with passages that are not in alignment.

In contrast to the present claimed invention, the prior art does not anticipate or render obvious such an arrangement. For example, the Danielsson et al. reference shows holes 110 in alignment in Figure 1c. Similarly, the Sauli reference shows electric field condensing areas in the form of bored-through holes 1<sub>i</sub> (col. 6, lines 28-32) in alignment in Figures 6a, 6b and 7b (see electrical field vectors E). Moreover, there is no

description in the cited references to suggest modification to the alignment of the holes so that they do not align in adjacent converter devices. Therefore, the amended claims are believed to be patentable over the cited references.

Additionally, the new claims add independent grounds for patentability over the cited references. Claims 19-21 each include the limitation of first and second converter layers disposed on the first and second conductive layers to define outermost parts of the conductive device. Notwithstanding the determination that the prior claims were obvious based on a combination of Danielsson in view of Gleason, the cited references do not teach or suggest first and second converter layers on first and second conductive layers.

In this regard, even if Danielsson could be said to teach all of the prior claim limitations except for the explicit description that at least one converter layer is arranged on at least one of the first and second conductive layers (Decision on Appeal, pp. 5-6), it cannot be said to teach both first and second converter layers on first and second conductive layers. That such a layer could be disposed on one layer does not make it obvious to require it be disposed on both conductive layers as the outermost parts of the conductive device.

Based on the above, applicants respectfully submit that the amended independent claims are patentable over the cited prior art. Early and favorable action is therefore earnestly solicited.

Respectfully submitted,



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